

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DEONTE JAMES,)	Case No. 1:21-cv-1958
)	
Plaintiff,)	Judge J. Philip Calabrese
v.)	
)	Magistrate Judge Jonathan D.
CUYAHOGA COUNTY, et al.)	Greenberg
)	
Defendants.)	

**DEFENDANT CUYAHOGA COUNTY'S SUPPLEMENTAL ANSWERS TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Cuyahoga County provides the following supplemental answers to Plaintiff's First Set of Interrogatories pursuant to Fed. R. of Civ. P. 33.

INTERROGATORIES

1. For each Request for Admission that you admit, state all of the following:

- A. Whether the video(s) ever existed within Defendant Cuyahoga County's possession, custody, and/or control, and if so, how many such videos existed;
- B. The reason the video(s) does or do not exist within Defendant Cuyahoga County's possession, custody, and/or control;
- C. Whether Defendant Cuyahoga County discarded, destroyed, or deleted the video(s);
- D. The name and job title of the Cuyahoga County employee or officer who authorized the discarding, destruction, or deletion of the video(s).

Answer: Subject to and without waiving the objections set forth in the County's initial objections and responses in Interrogatory No. 1, the County hereby supplements its Answer to Interrogatory No. 1 by stating that, for each Request for Admission where the County admitted the Request, the County hereby answers each of the subparts of Interrogatory No. 1 as follows:

A. Whether the video(s) ever existed within Defendant Cuyahoga County's possession, custody, and/or control, and if so, how many such videos existed;

Answer: Based upon the facts set forth in the attached Declarations, the County believes that there never was a video that was the subject of the Requests for Admissions that were admitted.

B. The reason the video(s) does or do not exist within Defendant Cuyahoga County's possession, custody, and/or control;

Answer: The reasons why a video does not exist are set forth more fully in the attached Declarations, which are incorporated herein by reference.

C. Whether Defendant Cuyahoga County discarded, destroyed, or deleted the video(s);

Answer: For the reasons set forth in the attached Declarations, the County states it did not discard, destroy, or delete any videos that were the subject of the Requests for Admissions that were admitted.

D. The name and job title of the Cuyahoga County employee or officer who authorized the discarding, destruction, or deletion of the video(s).

Answer: N/A. See Answer to sub-part (C).

Dated: March 30, 2023

Respectfully submitted,

Michael C. O'Malley, Prosecuting Attorney of
Cuyahoga County, Ohio

By: /s/Janeane R. Cappara
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2023, a copy of the foregoing Supplemental
Interrogatory Answers was served via email to Plaintiff's counsel of record: Ashlie Case Sletvold
at asletvold@peifferwolf.com and Jessica Savoie at jsavoie@peifferwolf.com.

/s/Janeane R. Cappara
Janeane R. Cappara (0072031)